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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
JOHNNY TOVAR,  
  
Defendant.

CASE NO: 2:16-cr-00291-GMN-PAL

**JOHNNY TOVAR'S UNOPPOSED  
MOTION FOR TEMPORARY  
MODIFICATION OF CONDITIONS OF  
PRETRIAL RELEASE TO PERMIT  
TRAVEL**

**\*Expedited Treatment Requested\***

Detention Judge: Hon. C.W. Hoffman.

COMES NOW, Defendant JOHNNY TOVAR, through his attorney of record, LUCAS J. GAFFNEY, ESQ., and hereby submits the instant unopposed motion to modify Mr. Tovar's pretrial release conditions to permit travel.

DATED this 2<sup>nd</sup> day of May, 2018

Respectfully submitted,

/s/ Lucas J. Gaffney  
LUCAS J. GAFFNEY, ESQ.  
Nevada Bar Number: 12373  
*Counsel for Johnny Tovar*

**MEMORANDUM OF POINTS AND AUTHORITIES**

This is the Defendant, Johnny Tovar's, unopposed motion to temporarily modify his conditions of pretrial release to permit travel. Undersigned counsel conferred with Kelly Bowen from pretrial services on April 30, 2018, and with the Government on May 1, 2018. Neither has any opposition to the following request. Mr. Tovar respectfully requests expedited treatment of this motion both because it is unopposed and because the relief requested would expire during an ordinary briefing schedule.

On September 30, 2016, the Court conducted Mr. Tovar's detention hearing and Magistrate Judge Hoffman released him on a PR Bond [ECF 13]. The PR Bond restricted Mr. Tovar's travel to Clark County, Nevada. Mr. Tovar now seeks the Court's permission to travel to Grand Junction, Iowa to attend a family wedding.

Mr. Tovar will leave Las Vegas, Nevada by vehicle on May 18, 2018, and return on May 21, 2018. While in Grand Junction, he will stay at 1118 U Avenue, Grand Junction, Iowa, 50107.

Therefore, there being no opposition, Mr. Tovar respectfully requests that the Court temporarily modify his conditions of pretrial release to accommodate the foregoing travel plans.

DATED this 2<sup>nd</sup> day of May, 2018

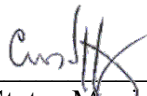
Respectfully submitted,

/s/ Lucas J. Gaffney  
LUCAS J. GAFFNEY, ESQ.  
Nevada Bar Number: 12373  
*Counsel for Johnny Tovar*

**ORDER**

Good cause appearing and there being no opposition, Johnny's Tovar's motion to temporarily modify the conditions of his pretrial release to permit travel is GRANTED.

DATED this 4<sup>th</sup> day of May, 2018.

  
\_\_\_\_\_  
United States Magistrate Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on this 2<sup>nd</sup> day of May, 2018, a true and correct copy of JOHNNY TOVAR'S UNOPPOSED MOTION FOR TEMPORARY MODIFICATION OF CONDITIONS OF PRETRIAL RELEASE TO PERMIT TRAVEL was served via the United States District Court CM/ECF system on all parties or persons requiring notice.

/s/ Lucas Gaffney  
An employee of Gaffney Law